

United States District Court

EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL DAVID PATTON,

Defendant.

CRIMINAL COMPLAINT

Case No. 23-MJ-12-GLJ

I, SA Jan Kum, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about October 19, 2022, in the Eastern District of Oklahoma, defendant, **MICHAEL DAVID PATTON**, committed the crime of Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

See attached Affidavit of SA Jan Kum, which is attached hereto and made a part hereof by reference.

Continued on the attached sheet.

SA Jan Kum
Federal Bureau of Investigation
Complainant

Sworn to me at: MUSKOGEE, OKLAHOMA

Date: January 17, 2023

GERALD L. JACKSON
UNITED STATES MAGISTRATE JUDGE
Title of Judicial Officer


Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT

1. I, Special Agent Jan Kum, being duly sworn, do depose and state the following:

INTRODUCTION

2. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since December 2010. I am currently assigned to the Oklahoma City Division, Ardmore Resident Agency.

3. As a Special Agent, I am authorized to investigate violations of the laws of the United States, and to execute warrants issued under the authority of the United States.

4. The statements contained in this Affidavit are based in part on: information provided by other agencies, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that **MICHAEL DAVID PATTON**, committed the below-described offenses, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

FACTS IN SUPPORT OF PROBABLE CAUSE

5. Based upon the following facts, I believe that probable cause exists to show that **MICHAEL DAVID PATTON** committed the crime of Murder in Indian Country in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.

6. DEFENDANT: the defendant is **MICHAEL DAVID PATTON**, date of birth (DOB) August 26, 1992, hereinafter referred to as **PATTON**. **PATTON** is a member of the Chickasaw Nation and possesses a quantum of Indian blood.

7. This affidavit is intended to show there is sufficient probable cause for a Complaint and does not set forth all of my knowledge about this matter. This affidavit is made in support of a Complaint and Arrest Warrant for a crime in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153. In support of this request, I submit the following:

8. On October 19, 2022, **PATTON** communicated with his former girlfriend, D.N., via Facebook messenger about picking her up from Wewoka, OK, sometime between noon and 1:30 p.m. and bringing her back to his residence. **PATTON** lived with his mother, R.Y., at 823 S. Gulf Street, Holdenville, OK 74848. He failed to show up as planned. D.N. hung out drinking with her friend E.F.. Sometime in the evening, D.N. and E.F. went to D.N.'s house, 220 W. 6th Street, Wewoka, OK ("Crime Scene"), where they fell asleep on D.N.'s bed. D.N.'s residence is located in in the territorial boundaries of the Seminole Nation, in Indian Country, and within the Eastern District of Oklahoma.

9. At approximately 9:25 p.m., R.Y. drove **PATTON** to the Crime Scene. According to R.Y., **PATTON** tried to enter the Crime Scene through the front door, but when he could not enter, he went around to the back of the residence and gained entry. Law enforcement later noticed the board across the back door appeared to be ripped off. According to D.N., **PATTON** kicked in the locked bedroom door in which D.N. and E.F. were sleeping. After **PATTON** entered the residence, **PATTON** stabbed E.F. numerous times with a sharp object and left the Crime Scene. D.N. observed E.F. bleeding and gasping for air. She ran to a neighbor's house screaming for help.

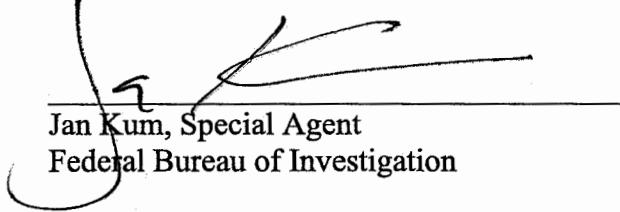
10. E.F. was taken to the Shawnee Emergency Room and later declared dead.

11. On October 20, 2022, law enforcement went to **PATTON** and R.Y.'s residence, 823 S. Gulf Street, Holdenville, OK 74848. **PATTON** stated he had gone to the Crime Scene to pick up D.N. **PATTON** stated he removed a board to enter through the back door. He admitted to getting into a fistfight with E.F. but denied stabbing him.

12. Based on a review of this case, and based on my knowledge and experience, I, as your Affiant, have probable cause to believe **MICHAEL DAVID PATTON** committed the crime of Murder in Indian Country in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.

CONCLUSION

13. I believe that probable cause exists to show that **PATTON** committed a violation of Title 18 United States Code, Sections 1111(a), 1151, and 1153.



Jan Kum, Special Agent
Federal Bureau of Investigation

SWORN to me on this 17th day of January 2023.



United States Magistrate Judge